

US EPA ARCHIVE DOCUMENT

Agriculture Sector Plan 2009-2010

Vision:

To identify a list of priority actions through 2010 from voluntary and regulatory programs including USDA Farm Bill programs as well as corporate stewardship efforts to reduce nutrient, sediment, pathogen and toxic impairments of Region 3 waters from agricultural lands. The list will also include actions related to habitat and emerging contaminants of concern. These actions will be based on available data including logic models and GIS. The HW-Agriculture workgroup will also benefit from sharing program information across Region 3 divisions and field offices.

Goals:

1. Reduce nutrient, sediment, pathogen and toxic impairments.
2. Address habitat and human health issues.
3. Address emerging contaminants of concern
4. Data analysis and geographic targeting
5. Share program information

How do the projects fit together to deliver the wholesale changes we desire?

- Unprecedented collaboration across team, branches, offices and divisions.
- Integration of regulatory and non-regulatory programs and tools
- Enforcement/compliance activities under #3 and #5 foster and encourage #2

Synergy of Projects to Reduce Nutrients

Three general themes run across the eight (8) priority agriculture projects.

- Integration of programs and external partners
- Comprehensive management of manure from the livestock and poultry industry
- Leveraging external partners to accelerate BMPs and promote cellulosic materials for ethanol plants

The Ecological and Restoration for Wetland, Riparian, and Water Quality project focuses on integration and targeting of technical and financial resources on impaired watersheds and habitats from agriculture production. The first phase is to analyze programs, consider program guidance changes that reflect integration and targeting opportunities, share recommended changes with states, rollout innovative program guidance and evaluate results. Based on results integrate the process to full scale state and federal agencies. The project relies upon a variety of data tools as well as a cross divisional team to address program opportunities. Initially the team will need to develop an understanding of program criteria/guidance to be able to apply this knowledge to integration opportunities (319/CBP grant opportunities).

Wholesale changes based upon implementation of projects 2,3,5,6,7 & 8 will address the transfer of nutrients emanating from animal feeding operations and comprehensively manage manure and litter. All of these projects include milestone activities that are directly tied to reducing nutrients by implementing a variety of manure management approaches. These approaches include:

- Implementing voluntary compliance programs for corporate leaders
- Utilizing CWA and SDWA authorities to address MCL violations and increase CAFO permit coverage
- Developing sampling and analytical capability to support case development working with Fort Meade
- Developing innovative tools to guide inspections
- Enhancing compliance assistance efforts
- Promoting new markets for organic fertilizer
- Supporting local sustainability efforts that focus on addressing manure management alternatives
- Supporting expanded efforts in the Potomac basin to reduce pathogens and nutrients
- Developing agreements with CSREES and Sysco to utilize both expertise and strong interest to work together.

The Energy Independence and Security Act of 2007 has generated a tremendous amount of interest in particular for Region 3 and other regions where increased nutrient loadings that result from higher grain plantings spurred by rising grain prices will cause adverse environmental consequences. As the region continues to plant increased grain for either ethanol plants or animal feed consumption, recent reports are indicating that ethanol produced from cellulosic sources would remove negative impacts. Opportunities to support needed research for utilizing cellulosic materials is available from DOE/USDA and NFWF grant programs. New Farm Bill funds will also become available. Our goal remains to leverage all of these programs in an integrated fashion to reduce environmental impacts and promote economic stability by promoting full utilization as soon as possible for cellulosic materials.

Healthy Waters Agriculture Sector Projects

1. Integrated Network for Ecological Restoration on Agricultural Lands

Objective: Develop a collaborative internal and external restoration network among Region III programs and subsequently NRCS, USFWS, USCOE, MDE/MDDNR, NGO's, county governments, and watershed associations in central Maryland. Building upon CWA Section 404 and Section 319 grants, it is hoped that this FY09 Agricultural Pilot will naturally lead us into the FY10 Natural Infrastructure Pilot.

2. Corporate Stewardship Agreements with Livestock and Poultry Companies to Reduce Nutrients

Objective: Develop agreements with livestock and poultry companies that have an interest in a voluntary compliance effort that would enhance compliance with CAFO requirements at their growing operations and reduce nutrient loads. Determine whether the Performance Track program would also be of mutual program of interest.

3. A Coordinated Effort of SDWA and CWA Authorities in Lancaster Co., PA.

Objective: This project will utilize Groundwater and Enforcement efforts in Lancaster Co., Pa seeking to address MCL violations, increase treatment at PWSs, and protect source water in order to reduce nutrients, sediment, pathogens, toxics, and other emerging contaminants from agricultural sources to groundwater and surface water used for drinking water and to the Chesapeake Bay. The results of that effort will be used to target CAFO inspections, ensure effective implementation of Nutrient Management Plans (NMPs), and increase CAFO permit coverage.

4. Reduce Nutrients from Increased Grain Production

Objective: Support recommendations from the Chesapeake Cellulosic Biofuels Summit

With an estimated 300,000 new acres of corn being grown in the Bay drainage in coming years there will be about 5 million additional pounds of nitrogen sent to the Bay. To put this in perspective, an additional 5 million pounds per year represents nearly half of the 10.4 million pounds of nitrogen load reductions credited to agriculture over the five year period 2000-2005..

5. Effective Nutrient Management and CAFO Program Implementation

Objective: Reduce manure and litter pollutant transport to streams and groundwater by ensuring effective implementation of Nutrient Management Plans (NMPs) and the CAFO permit program. This will result in a reduction of nutrients, sediment, pathogens, toxins, and other emerging contaminants to the Chesapeake Bay Basin from agricultural activities.

6. Develop Alternatives that Address Excess Poultry Litter and other Livestock Manures

Objective: To implement a comprehensive plan that reduces nitrogen runoff and phosphorus accumulation in soils throughout waterways from over application of manure and litter. The three regions that have the highest concentration of livestock and poultry are the Lower Susquehanna River basin in PA, the Shenandoah Valley in VA and WV, and the Delmarva Peninsula in DE, MD and VA. According to the Chesapeake Bay Foundation's report, "Manure's Impact on Rivers, Streams, and the Chesapeake Bay", July 2004, the amount of excess manure produced in each one of the concentrated areas in Region 3 by all livestock ranges from 250,000-600,000 tons.

7. Combining the goals and outcomes of CWA/SDWA activities thru Partners for the Potomac

Objective: Use an integrated water resource management approach to reduce nutrients and sediments by combining the goals and outcomes of CWA/SDWA activities to achieve mutual objectives in selected tributaries to the Potomac River Basin, a major contributor of pollutant loadings to the lower Chesapeake Bay. This strategy will be accomplished by expanding the Potomac Drinking Water Source Protection Partnership (DWSPP) on-going work in the area of pathogens, Disinfection byproducts (DBP), and emerging contaminants.

8. Support Activities:

a. Develop/Enhance Partnership with CSREES, Extension Service and Land Grant Universities to enlist their support for Region 3/Bay Ag Activities

Objective: Develop thru CSREES/Extension Service BMP education, outreach and technical assistance programs to provide support for Ag Sector Activities and Bay Action Plan priorities.

b. Enlist Large National Food Processors to have their suppliers reduce nutrients

Objective: Enlist large national food processors (beginning with Sysco and eventually expanding to General Mills, Unilever, Del Monte, etc.) to support/lead efforts with their suppliers (farmers and mid-level integrators (e.g., poultry companies) to reduce nutrients on Region 3 farms based on Bay Action Plan and Region 3 Ag Sector priorities.

1. Integrated Network for Ecological Restoration on Agricultural Lands

Objective: Develop a collaborative internal and external restoration network among Region III programs and subsequently NRCS, USFWS, USCOE, MDE/MDDNR, NGO's, county governments, and watershed associations in central Maryland. Building upon CWA Section 404 and Section 319 grants, it is hoped that this FY09 Agricultural Pilot will naturally lead us into the FY10 Natural Infrastructure Pilot.

Measures and Milestones. Successful implementation of this initiative will better target nutrient, sediment, bacteria, and stormwater reductions. It will focus Federal, State and local resources to high priority loading areas and to water quality and wetlands sub-objectives. Watersheds are being degraded by agricultural ditching, animal grazing, excessive sedimentation, nutrient, and bacteria over-enrichment. The loss of healthy wetlands diminishes water quality, fish and wildlife habitat and reduces floodwater storage capacity. (See PAMs/Measures WT-1; 4.3.2; SP-21; SP-22; SP-35; SP-36; SP-37; SP-8; and WQ-21)

- By 08/01/08 coordinate with EAID Natural Infrastructure Team; initiate Agr/NI Team meetings;
- By 08/15/08 identify implementation strategy/outreach plan with MDE, MDDNR, & NRCS;
- By 09/30/08 initiate external dialogue (MDE/MDDNR/NRCS);
- By 10/31/08 initiate dialogue with CBP Wetlands Workgroup;
- By 1/01/09 accelerate implementation in targeted areas;
- Assess implementation and payback to pollution reduction goals by 09/30/09.

Strategy: 1) Develop and implement an improved targeting methodology that identifies watersheds whose water quality and ecological habitat are impacted primarily from agricultural production; 2) assess wetland and riparian condition within Region III watersheds currently impaired by nutrient, sediment, bacteria, and stormwater loadings; 3) identify wetland, riparian, and water quality stream restoration opportunities including those in legacy sediment areas that will result in quantifiable environmental results within those watersheds. The project will better integrate EPA programs (e.g., 319 watershed plans, TMDL implementation efforts, wetland restoration and source water protection) and target non-EPA federal, state and local resources to areas most in need of nutrient and sediment load reductions using the best available data tools (SPARROW, GRIPS, MIRA and others). The methodology will include traditional and nontraditional data sources such as impaired waters, TMDL allocations, wetland and riparian condition (including forest buffers), source water protection considerations and the reductions necessary to achieve down stream nutrient/sediment goals for estuaries such as the Chesapeake, Delaware, Inland and Coastal Bays. Nontraditional considerations (social, political, current local investment and other factors identified by outside partners) will also be examined. An internal team needs to consolidate an understanding of how each program works, and establish our points of leverage. This strategy specifically addresses our Healthy Waters goals to better connect our programs, target opportunities and leverage external resources through partnerships.

2. Corporate Stewardship Agreements with Livestock and Poultry Companies to Reduce Nutrients

Objective: Develop agreements with livestock and poultry companies that have an interest in a voluntary compliance effort that would enhance compliance with CAFO requirements at their growing operations and reduce nutrient loads. Determine whether the Performance Track program would also be of mutual program of interest.

Strategy: Based on the success of the Perdue-EPA Clean Bays Agreement a similar approach with other poultry and swine integrators and dairy companies could result in corporate stewardship agreements that involve corporate management and producers participating in a program consisting of: Training, Environmental Assessments, Recognition and Environmental Results. In Region 3 there are a number of poultry and swine corporations that are part of vertically integrated management system which produce a significant amount of meat products for the consumer. Mountaire Farms, Allen Family Farms, Pilgrims Pride, and Cargill represent the poultry and turkey industry. Smithfield Farms, Country View Farms and others represent the swine industry. All of these corporations have contractual agreements with their growers to raise animals under strict guidelines and deliver a finished product based on incentive payments. The Dairy industry in Pennsylvania is a mix of large and small decentralized dairy farms with a significant impact upon the regional economy. Lancaster County has the largest dairy population per square mile in the nation. Trade organizations such as the Professional Dairy Managers of PA, the Center for Dairy Excellence and the Mid-Atlantic Dairy Association as well as dairy companies- Rutters, Turkey Hill and WAWA would represent the initial round of retail organizations.

Measure and Milestones

July 2008: Complete the list of potential corporate candidates for poultry and swine and a business background profile
 August 2008: Estimate nutrient load reductions from the Perdue Agreement
 September 2008: Complete feasibility analysis using a similar approach for the dairy industry
 November 2008: Complete initial round of meetings with corporations
 December 2008: Draft two (2) Corporate Stewardship Agreements
 March 2009: Finalize two (2) Corporate Stewardship Agreements
 June 2009: Complete training and outreach programs
 July 2009: Start first phase of on-farm environmental assessments

3. A Coordinated Effort of SDWA and CWA Authorities in Lancaster Co., PA.

Objective: This project will utilize Groundwater and Enforcement efforts in Lancaster Co., Pa seeking to address MCL violations, increase treatment at PWSs, and protect source water in order to reduce nutrients, sediment, pathogens, toxics, and other emerging contaminants from agricultural sources to groundwater and surface water used for drinking water and to the Chesapeake Bay. The results of that effort will be used to target CAFO inspections, ensure effective implementation of Nutrient Management Plans (NMPs), and increase CAFO permit coverage.

Strategy

- Enforcement: SDWA will protect human health and use nitrate MCL violations to help NPDES CAFO target inspections which will show presents and commitment to an important area of concern
- Source Water Protection: form strong partnerships to develop assessment plans and implementation
- Outreach and Education: a properly informed public + faith in their government = the power of the people
- Press and Publicity: be proactive, not reactive. Notify public we are there and helping.
- Data: accurate and usable
- Research: analysis of anthropogenic contaminants, sources of water and contaminants to wells, etc.
- Nutrient Management Plans: implementation and enforcement of increasingly effective plans
- Non-regulated interests: private well owners will know the USEPA looks out for there interests
- Corporate Stewardship: use a collaborative effort of enforcement, partnerships, publicity, education, etc. to persuade industry to become Corporate Stewards

Measures and Milestones*

Measures: Number of UIC and NPDES inspections; private wells sampled; wells with treatment meeting MCLs, new treatment systems installed; NMPs reviewed and/or created; pounds of nutrients reduced; tons of sediment reduced; TMDL; streams meeting designated uses; Source Water Protection Assessments completed and their implementation

- 2/08 - GW&E: Initiate communications with state agencies and target MCL violations and systems with no treatment, etc.
- 5/08 – Create collaborative GIS maps of special protection watersheds, wellhead protection/source water protection areas, public drinking water systems, sampled private wells, identified farms, approved watershed management plans, etc.
- 6/08 – CAFO Enforcement Team: Identify farms for initial inspections
- 6/08 – GW&E: \$20,000 funding to USGS and PDA for sampling/study, fix SDWA data discrepancies, create sampling plan for private wells in target areas
- 7/08 – CBPO: Contact target area's State Conservation Commission to get status of state on-site reviews and inspection reports in specified target areas.
- 8/08 – CBPO: Visit County Conservation District Offices to obtain copies of current NMPs in target areas. Review NMPs.
- 9/08 – CAFO Enforcement Team: Identify new round of inspections based on results of sampling/study
- 6/09 – Compare progress of approach with Litter and Manure activities in the Delmarva and Potomac

4. Reduce Nutrients from Increased Grain Production

Objective:

Support recommendations from the Chesapeake Cellulosic Biofuels Summit

With an estimated 300,000 new acres of corn being grown in the Bay drainage in coming years there will be about 5 million additional pounds of nitrogen sent to the Bay. To put this in perspective, an additional 5 million pounds per year represents nearly half of the 10.4 million pounds of nitrogen load reductions credited to agriculture over the five year period 2000-2005.

Strategy

Address the impact of the dramatic increase of corn acres in Region 3 (i.e. 300,000 additional acres projected to be planted in the Chesapeake Bay watershed) on nutrient and pesticide loads to the Bay.

- Promote basic and advanced conservation practices in coordination with USDA- CSREES-Water Quality Program and USDA- NRCS that significantly reduces environmental impacts
- Evaluate the environmental and economic impacts of utilizing crop residues (corn stover) for biofuel production
- Evaluate the impact of Dried Distillers Grain on livestock (i.e. dairy) feed phosphorus content
- Promote dual use of growing perennial plants (i.e. switchgrass) and corn in sensitive areas.
- Participate in the national Biofuels Strategy and employ lessons learned to Region 3
- Work with the Office of Transportation and Air Quality, CBPO and OW on merging predictive environmental models
- Partner with NRCS to help shape spending new Farm Bill funds to maximize nutrient reductions
- Use GRIPS to identify geographic areas throughout Region 3 that are significant areas for corn production as a feedstock for ethanol
- Promote NFWF and DOE/USDA grant programs to support research projects.
- Support the transfer of completed research throughout Region 3
- Support recommendations from the Chesapeake Cellulosic Biofuels Summit - September 4, 2008, Harrisburg, PA

Milestones and Measures

- June 2008: develop a list targeted basic and advanced conservation practices
- October 2008: Integrate resource needs in the CSREES-EPA Agreement
- December 2008: complete geographic targeting analysis –GRIPS (land areas i.e., wheat, soybean, hay, pasture being converted)
- As new Farm Bill programs are implemented work with USDA- NRCS State Conservationists and state agencies that administer agricultural cost share programs to identify opportunities for directing resources (cost share funding, incentive payments, technical assistance) towards priority conservation practices as well as linking farmers' cost share eligibility to implementing effective nutrient reduction programs.
- September 2008 : Participate in the Chesapeake Cellulosic Biofuels Summit
- December 2008: evaluate weather additional data analysis is need for atmospheric deposition of nitrogen and impact of increased grain production on groundwater and drinking water supplies
- January-March 2009: Evaluate the effectiveness of new Farm Bill programs on reducing nutrients in sensitive waters.

Measures

- Reduce 30 % the projected corn acreage nitrogen load by implementing suites of basic and advanced conservation practices
- Develop and implement comprehensive conservation and nutrient management plans on new corn acreage
- Track and publish yearly crop production trends in the region through analysis of NASS data and surveys

5. Effective Nutrient Management and CAFO Program Implementation

Objective: Reduce manure and litter pollutant transport to streams and groundwater by ensuring effective implementation of Nutrient Management Plans (NMPs) and the CAFO permit program. This will result in a reduction of nutrients, sediment, pathogens, toxins, and other emerging contaminants to the Chesapeake Bay Basin from agricultural activities.

Strategy:

- a. Develop sampling and analytic capability to support case development by working with Fort Meade.
- b. Develop aerial surveillance flights capability and utilize to guide inspection targeting by working with Department of Interior.
- c. Train WPD staff in modeling and sampling techniques
- d. Continue an aggressive inspection campaign directed toward increasing permit coverage and compliance and take aggressive enforcement action.

- e. Development of state agreements on permitting and compliance assurance strategies including CAFO Programs submittals.
- f. Examine the coverage and effectiveness of nutrient management plans on the Delmarva.

Measures and Milestones:

- Yearly inspections of approximately 30 agricultural sources and follow-up enforcement.
- Complete discussions with Fort Meade Lab on sampling and analysis capability – November 2008
- Development of Delaware Compliance Assurance and Permitting Strategy –December 2008
- Development and Implementation of NMP plan effectiveness study – December 2010
- Revisions to state CAFO programs to bring in alignment with any promulgated revised CAFO regulation – December 2010

6. Develop Alternatives that Address Excess Poultry Litter and other Livestock Manures

Objective: To implement a comprehensive plan that reduces nitrogen runoff and phosphorus accumulation in soils throughout waterways from over application of manure and litter. The three regions that have the highest concentration of livestock and poultry are the Lower Susquehanna River basin in PA, the Shenandoah Valley in VA and WV, and the Delmarva Peninsula in DE, MD and VA. According to the Chesapeake Bay Foundation's report, "Manure's Impact on Rivers, Streams, and the Chesapeake Bay", July 2004, the amount of excess manure produced in each one of the concentrated areas in Region 3 by all livestock ranges from 250,000-600,000 tons.

Strategy

1. Identify the water quality concerns associated with poultry litter application.
2. Identify the amount of poultry litter and other livestock manures available for new markets
3. Summarize state legislation that has been developed and passed.
4. Convince federal and state Department of Transportation agencies to use poultry litter and other forms of livestock manures on reconstruction and new highway landscaping projects
5. Identify other alternative technologies or markets that could utilize poultry litter and other forms of livestock manures
6. Participate and support the Eastern Shore Collaborative a partnership endeavor whose goal is to improve water quality and promote economic stability for the agricultural community throughout Delmarva.
7. Participate in the Virginia Waste Solutions Forum whose goal is to improve water quality and promote economic stability for the agricultural community in the Shenandoah Valley, Virginia.
8. Work with CSREES to educate the agricultural community on the alternative uses of poultry litter and other sources of livestock manures
9. Work with states to promote alternative technologies for utilizing excess manure /litter and regional coordination and support for transportation of poultry litter and other forms of livestock manures
10. Reform public procurement policies and develop technical specifications to accelerate state and federal end users to use manure/litter based products.
11. Initiate a process to validate compliance with nutrient management plans for row crop producers
12. Develop the technical documentation that underscores water quality concerns from implementing state phosphorus site indexes.

Milestones and Measures

April 2008: Meet with GSA (NRC) to use poultry litter as a replacement to commercial fertilizer on all federal building grounds
 July 2008: Meet with GSA-Philadelphia Regional Office to replace commercial fertilizer with organic material
 July 2008: Discuss with the CBPO work load sharing activities to implement recommendations from the report, "Turning Chesapeake Bay Watershed Poultry Manure and Litter into Energy", January 2008
 September 2008: Meet with military golf superintendents
 November 2008: Meet with state and federal transportation agencies
 November 2008: Sign agreement with GSA to use poultry litter and other organic material as a replacement to purchasing commercial fertilizer on all federal lands

7. Combining the goals and outcomes of CWA/SDWA activities thru Partners for the Potomac

Objective: Use an integrated water resource management approach to reduce nutrients and sediments by combining the goals and outcomes of CWA/SDWA activities to achieve mutual objectives in selected tributaries to the Potomac River Basin, a major contributor of pollutant loadings to the lower Chesapeake Bay. This strategy will be accomplished by expanding the Potomac Drinking Water Source Protection Partnership (DWSPP) on-going work in the area of pathogens, Disinfection byproducts (DBP), and emerging contaminants.

Strategy: Reductions in nutrients, sediments, pathogens and toxics are likely to result in a reduction in disinfection by products precursors (DBPp) in source waters to drinking water intakes. Reduction in human cancer risk from tap water via reduction of DBPp in community water systems can result from a decrease in DBPp total organic carbon (TOC) compounds. DBP result, in part, from chlorine reacting with TOC in source waters from agricultural runoff and other activities. TOC reductions in drinking water sources will be obtained by a decrease in nutrients, sediments and pathogens and toxics reaching streams from agricultural lands via manure/litter spreading, fertilizer/pesticide application and soil erosion.

A pilot project will be developed by focusing on a few sub-watersheds with significant agricultural operations that show high levels of TOC and also serve as drinking water sources. Focused point and non-point BMPs, education programs and stream restoration programs in these sub-watersheds will occur. Comparison of future TOC and DBP data to current baseline results will be used to measure success.

The project uses data integration to support outcomes based work from source water assessments targeting drinking water utilities with surface intakes that have listed agriculture as the number one potential source of contamination, identifying areas of significant litter and manure application. That analysis will be combined with TOC and DBP source water data from SDWA required monitoring (supplied by states) to assess the contaminant signatures of agricultural derived contaminants using *Cryptosporidium* occurrence data.

Project will be assisted by current and future data mining efforts and the Disinfection Byproduct Reduction Strategy implementation by the Drinking Water Branch. This project will innovatively leverage pollutant load reductions through the focused attention of public health impacts and the community support efforts of local municipal drinking water suppliers.

Measures and Milestones:

5/31/08: Outline activities to begin team building development and site identification
 7/31/08: Identify data gaps and needs for data mining in identification of compliance trends.
 9/30/08: Select initial target sub-watersheds and continue team building
 3/31/09: At least one pilot project developed and data gathering and analysis completed and monitoring strategy developed

8. Support Activities:

I. Develop/Enhance Partnership with CSREES, Extension Service and Land Grant Universities to enlist their support for Region 3/Bay Ag Activities

Objective: Develop thru CSREES/Extension Service BMP education, outreach and technical assistance programs to provide support for Ag Sector Activities and Bay Action Plan priorities.

Strategy: We plan to develop an MOA with CREES through the University of Md and Tom Simpson led Mid-Atlantic Regional Water Program (MARWP) that in area covers all parts of Region 3 and includes support for the Ag Sector Team activities and the Chesapeake Bay Action Plan. We would work with university researchers to bring their knowledge and expertise into on-the-ground operations and build on current Ag Advisor efforts with Land Grant Universities. This activity has a significant chance to leverage the efforts of CREES related regional programs to support our identified needs.

Measures and Milestones

- Begin discussions with MARWP in 3rd quarter of this year (*start immediately*)
- 10/31/08: Develop a regional MOA with CREES through Tom Simpson and MARWP)
- 9/30/09: Assess implementation and payback to pollution reduction goals to determine future resource investment.

II. Enlist Large National Food Processors to have their suppliers reduce nutrients

Objective: Enlist large national food processors (beginning with Sysco and eventually expanding to General Mills, Unilever, Del Monte, etc.) to support/lead efforts with their suppliers (farmers and mid-level integrators (e.g., poultry companies) to reduce nutrients on Region 3 farms based on Bay Action Plan and Region 3 Ag Sector priorities.

Strategy: Using the interest of Sysco and support from OPEI, reach out to the Corporation and discuss areas of mutual interest. EPA activity is appropriate now because these national processors have recently become interested in expanding their efforts to water quality and have had some preliminary contacts with EPA and the University of MD. Our assistance is critical to steer these corporations to pilot their efforts here and into the right activities and watersheds that will get the large scale pollution reductions we need. This activity has a significant chance to leverage the efforts of others through these large food processors. A general activity similar to this is listed in the current draft of the CBP Ag Action Plan.

Measures and Milestones

- Begin discussions with Sysco in 3rd quarter of this year (*start immediately*)
- 9/30/08: Do a reality check on likely payback of this activity
- 10/30/08: Identify initial role, target areas and activities for Processors.